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UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN SINAGRA,

Defendant.

CRIMINAL INDICTMENT

2:12-CR- 294

VIOLATIONS:

18 U.S.C. § 1030(a)(2) – Obtaining Information
 By Computer from a Protected Computer;
 18 U.S.C. § 1028A(a)(1) – Aggravated Identity
 Theft

The Grand Jury Charges:

Introduction

1. Starting in January 2009, defendant worked as a limousine transportation manager for victim company A. As manager, defendant required the employees he supervised to provide their E-mail passwords to him, ostensibly so he could access their E-mail in case they left the company. On July 14, 2009, defendant's employment was terminated.

2. Around September 2009, defendant began working for another business that also provided limousine services.

3. After defendant started working for this new employer, he accessed 20 E-mail accounts belonging to his ex-employer without authorization. From November 10, 2009 to November 8, 2010, defendant used employees' user IDs and passwords to access these accounts,

1 select over 1,000 E-mails, and forward them to an E-mail account that he created under a
2 pseudonym.

3 4. Defendant later forwarded some of his ex-employer's E-mails to yet another E-mail
4 account that he created using a pseudonym based on a fictional television character named Sonny
5 Steelgrave.

6 5. The E-mails that defendant stole contained sensitive information such as lists of
7 employees and their compensation, lists of vendors and their contact information, price quotes to
8 customers, advertising budget proposals, and background checks on prospective company
9 employees.

10 **COUNT ONE**

11 **Obtaining Information By Computer from a Protected Computer**

12 6. The allegations set forth in the Introduction are re-alleged and incorporated as if fully
13 set forth herein.

14 7. From in or around November 2009 to in or around November 2010, in the District of
15 Nevada,

16 **JOHN SINAGRA,**

17 defendant, did intentionally access a computer without authorization, and thereby obtained
18 information from a protected computer, and did commit the offense for purposes of commercial
19 advantage and private financial gain, in violation of 18 U.S.C. § 1030(a)(2) and (c)(2)(B)(i), and the
20 value of the information obtained exceeded \$5,000, in violation of 18 U.S.C. § 1030(a)(2) and
21 (c)(2)(B)(iii).

22 **COUNT TWO**

Aggravated Identity Theft

23 8. The allegations set forth in the Introduction are re-alleged and incorporated as if fully
24 set forth herein.

9. From in or around November 2009 to in or around November 2010, in the District of Nevada,

JOHN SINAGRA,

defendant, did knowingly possess and use, without lawful authority, a means of identification of another person during and in relation to a violation of 18 U.S.C. § 1030(a)(2), all in violation of 18 U.S.C. § 1028A(a)(1).

DATED: this 8 day of August 2012.

A TRUE BILL:

/s/
FOREPERSON OF THE GRAND JURY

DANIEL G. BOGDEN
United States Attorney


MICHAEL CHU
Assistant United States Attorney